

# Exhibit F

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO  
ENTERO, ET AL.,

Plaintiffs,

vs.

GREGORY W. ABBOTT, ET AL.,

Defendants.

OCA-GREATER HOUSTON,  
ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

HOUSTON JUSTICE, ET AL.,

Plaintiffs,

vs.

GREGORY WAYNE ABBOTT,  
ET AL.,

Defendants.

LULAC TEXAS, ET AL.,

Plaintiffs,

vs.

JANE NELSON, ET AL.,

Defendants.

MI FAMILIA VOTA, ET AL.,

Case No. 5:21-CV-844-XR

Case No. 1:21-CV-780-XR

Case No. 5:21-CV-848-XR

Case No. 1:21-CV-0786-XR

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**MAGNA**   
LEGAL SERVICES

1 transcription, at the Office of the Texas Attorney  
2 General, Weston Centre, 112 East Pecan Street,  
3 3rd Floor, San Antonio, Texas 78205, pursuant to the  
4 Federal Rules of Civil Procedure and the provisions  
5 stated on the record or attached hereto.

1 quantify how many left and then came back?

2 A. No, sir.

3 Q. Okay. Now, focusing for a moment on poll  
4 watchers. Do you believe that there were any issues  
5 of fraud in the 2022 general election that poll  
6 watchers exposed in Bexar County?

7 A. No.

8 Q. I believe you testified last year that you  
9 considered the training that was provided to poll  
10 watchers to be a joke.

11 A. Correct.

12 Q. Do you remember that testimony?

13 A. Oh, absolutely.

14 Q. And in preparation for the general  
15 election, was the same training given to poll  
16 watchers?

17 A. No, they -- they did adapt it.

18 Q. And was the poll watcher training still a  
19 joke?

20 A. Yes, sir.

21 Q. And why was that, in your view?

22 A. Again, the first time it was just them  
23 listen -- listening to -- or it's not a PowerPoint.  
24 I don't know what it's called, but it has sound. But  
25 it's -- the sense of it, was just, like, a video they

1 listened and no qualifiers did -- did they complete  
2 it and there -- it was nothing. They just had their  
3 certificate.

4 And then when we made our feelings known,  
5 the -- they updated the PowerPoint to, then, ask some  
6 questions after the -- whatever, like, the segment  
7 and then there would be a couple questions, there  
8 would be a segment and a couple questions. But at no  
9 time did it have to pass -- you know, you have to  
10 have a 70, you have to have a 75. There was -- there  
11 was absolutely no metrics with it, that -- it's,  
12 like, okay if we sat here and completed it, here's  
13 your certificate. So, it still was not anything that  
14 we compared to our election officials.

15 Q. So, it's your understanding that a person  
16 could take the poll-watcher training and respond to  
17 the questions, and respond to the questions  
18 incorrectly and still pass the poll watcher?

19 A. Keep going. Yes, sir.

20 Q. In connection with the general election,  
21 did you lose election judges because of concerns  
22 about poll watchers?

23 A. Yes, sir.

24 Q. Did you lose other election employees?

25 A. No, not full-time staff. No.

1 Q. Did you lose poll workers?

2 A. Yes.

3 Q. So, is it your testimony that there were

4 people who were experienced election judges,

5 experienced alternates, experienced election clerks,

6 who stopped working with you during the 2022 election

7 because they were concerned about poll workers?

8 A. Yes, sir.

9 Q. About poll watchers?

10 A. Yes, sir.

11 Q. And were there individuals who had been  
12 election judges, alternates and election clerks who  
13 ultimately did not decide not to work with you but  
14 who needed persuasion and encouragement in order to  
15 stay with you?

16 A. Yes.

17 Q. And are you able to estimate the amount of  
18 time that you needed to put in to encouraging people  
19 to remain with you despite the poll watcher  
20 provision?

21 A. Again, I can't quantify it, but it was very  
22 necessary, on a one-on-one basis. I mean, when you  
23 have one of your better election officials tell you  
24 that they're not -- no longer going to work now  
25 because the poll watcher is going to be following

1 here. And so, everybody is very, very outgoing, and  
2 they're in a nonthreatening venue. They are among  
3 friends and people who would consider family.

4 So, our goal is to capture as much  
5 information as we can to be able to say in the pink  
6 note, or it's -- at the next election, please be  
7 aware, you'll have people trying to cross your  
8 100-foot mark. Please be aware you have, you know,  
9 overactive campaign workers. Please be aware, and  
10 that kind of stuff.

11 Q. So, in -- in terms of -- of where  
12 information that you have gained in those after  
13 action meetings gets turned into writing, it would be  
14 in the pink note?

15 A. Yes, sir.

16 Q. Anyplace else?

17 A. No.

18 Q. Okay.

19 A. I mean, you know, handwritten notes as  
20 you're sitting there talking but then they get thrown  
21 away.

22 Q. Okay. Do you know how many election judges  
23 you lost before the 2022 general election because of  
24 those individual's concerns about poll watchers?

25 A. Probably -- probably close to 20 percent



1 because we did -- we also -- again, please  
2 understand, we have our early voting sites.

3 Q. Uh-huh.

4 A. And again, per the code, as a vote center  
5 county, if we have this building as a -- as an early  
6 voting center, then it's required to be an election  
7 day site. So, if you've been there for two weeks,  
8 12 days, then the voters know to go there, so you  
9 have to be there.

10 And I had -- I -- we had a -- had a couple  
11 of our election officials in November specifically  
12 that completed early voting and then let us know at  
13 the end that they weren't going to do election day.  
14 They -- they -- they couldn't take it anymore. They  
15 just -- they -- they were exhausted, mentally and  
16 physically stressed. They weren't going to do it.  
17 So, you know, we -- we put somebody else in there.

18 Q. And that -- when you say "a couple," was  
19 it -- was it two? Or was it more than two?

20 A. It was a few more.

21 Q. Okay. And those individuals, were they  
22 judges, alternates or clerks?

23 A. The way it usually happens, sir, is that  
24 those groups are really tight-knit. They trust each  
25 other. They know how to handle it. So, if the

1 and then all of a sudden you're getting somebody,  
2 argh, argh, argh, argh, that's growling at them as  
3 they're handing their, you know, ID over to them.  
4 So, again, it -- it had a different tone.

5 Q. And -- so now to change the topic just a  
6 little. You testified back a year ago, little less  
7 than a year ago, that the secretary of state's office  
8 had not provided a handbook for election judges.

9 A. It's true.

10 Q. Did they -- did that office get a handbook  
11 to you for election judges in advance of the 2022  
12 general election?

13 A. Yes.

14 Q. Okay. But am I correct that that handbook  
15 did not include material concerning poll watchers?

16 A. It had -- it had a synopsis. But again,  
17 that's why we -- I felt compelled to give them the  
18 complete handbook of the poll watcher. These are the  
19 rules that they should have, so take a minute to read  
20 these, you know.

21 Q. Did you give your election judges any  
22 guidance concerning how close a poll watcher could  
23 get to a voter?

24 A. No.

25 Q. And did you give them any guidance